

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.

Defendants.

Case No.: 1:23-cv-06188-ER

**REDACTED VERSION OF
DOCUMENT SOUGHT TO BE
SEALED**

DECLARATION OF SCOTT SYMS

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that:

1. I am a citizen of the United States and am over 18 years of age. I am a research analyst in the Bureau of Economics of the U.S. Federal Trade Commission (“FTC” or “Commission”). I submit this declaration in support of the Commission’s Motion for a Temporary Restraining Order.
2. I make this declaration based on my own personal knowledge and/or information made known to me in the course of my official duties, and if called to testify to the truth of the matters herein, I could and would do so competently.
3. My responsibilities at the FTC include performing statistical and econometric analyses, researching economic literature, and helping to develop economic models to support investigations conducted by FTC attorneys and economists, including merger investigations. In the normal course of carrying out my responsibilities, I regularly compute market shares using data gathered in investigations.

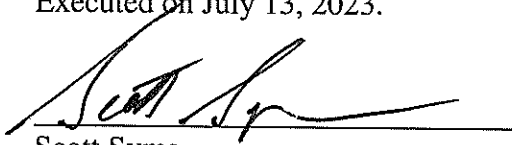
4. In connection with the FTC’s investigation of the proposed acquisition of Propel Media, Inc. (“PMI” or “DeepIntent”) by IQVIA Holdings Inc. (“IQVIA”), I was tasked to calculate market shares and the Herfindahl-Hirschman Index (“HHI”) based on revenue in the alleged relevant antitrust market of U.S. healthcare professional (“HCP”) programmatic advertising. I have not otherwise participated in the FTC’s investigation, nor have I performed any other work in connection with the investigation. The HHI is calculated by summing the squares of the market shares of each market participant. To calculate the HHI, I used available data supplied by DeepIntent, IQVIA, and other market participants.

5. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 13, 2023.



Scott Syms

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 17, 2023, I electronically filed a true and correct copy of the foregoing document using the United States District Court for the Southern District of New York CM/ECF System.

I FURTHER CERTIFY that I served the foregoing document on the following counsel via electronic mail:

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